

BEFORE THE INDEPENDENT HEARINGS PANEL

IN THE MATTER OF: Application for land use consent,
pursuant to section 9(3) RMA for 2
Jervois Quay, Wellington, SR 513399

APPLICANT: New Zealand Fruitgrowers'
Charitable Trust

CONSENT AUTHORITY: Wellington City Council

SECTION 42A REPORT OF CHESSA STEVENS – HERITAGE ASSESSMENT

Dated 15 November 2022

Qualifications

1. My full name is Francesca Louise Stevens. I practice under my abbreviated name, Chessa Stevens. I am Principal Conservation Architect and National Built Heritage Lead at WSP New Zealand Ltd.
2. I have the following qualifications and experience relevant to the evidence I shall give:
 - (a) I hold a Master of Arts with Distinction in Conservation Studies from the University of York, United Kingdom.
 - (b) I hold a Bachelor of Architecture with Honours from Victoria University of Wellington, New Zealand.
 - (c) I hold a Bachelor of Arts degree from Victoria University of Wellington, New Zealand.
 - (d) I am a Registered Architect with the New Zealand Registered Architects Board.
 - (e) I am a member of the Executive Board and Co-Secretary of ICOMOS New Zealand (the International Council of Monuments and Sites).
 - (f) I have approximately fourteen years' experience in architecture, specialising in heritage and historic buildings.
3. I have prepared this evidence on behalf of the Wellington City Council (WCC) to assess the heritage effects of the Resource Consent Application relating to the Huddart Parker Building at 2 Jervois Quay, Wellington, being SR No. 513399.

Expert Witnesses – Code Of Conduct

4. I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that except where

I state I am relying on information provided by another party, the content of this evidence is within my area of expertise.

Background

5. The Resource Consent Application to erect an electronic billboard attached to the existing framework on the roof of the Huddart Parker Building was received by WCC in May 2020, at which time I was engaged to provide heritage advisory services in the capacity of a council officer in relation to the Application.
6. I prepared a Heritage Advisor Assessment on the Resource Consent Application, dated 22 June 2022, which was reviewed by the WCC Heritage Team. This s42A report reiterates points made in that assessment, along with additional points.
7. The application was publicly notified on 23 August 2022. Submissions closed on 20 September 2022.
8. I am scheduled to be on holiday overseas at the time this Application is to be considered by the Independent Hearings Panel. I understand that a Wellington City Council Heritage Advisor will be presenting at the Hearing in my absence.

Scope of Evidence

9. My assessment considers the following matters:
 - (a) The heritage significance of the Huddart Parker Building.
 - (b) How the works proposed in the Resource Consent Application do, or do not, conform to the assessment criteria given in the Wellington City District Plan (WCDP).
 - (c) How the works proposed under in the Resource Consent Application do, or do not, conform with heritage best practice.
 - (d) Whether there is sufficient justification for the negative effects that the works proposed under the Resource Consent Application may have on the building.

- (e) Whether there is sufficient mitigation for the negative effects that the works proposed under the Resource Consent Application may have on the building.

Description of the Site and Building

10. The subject site is flat and trapezoidal in shape, bounded by Grey Street to the north, Jervois Quay to the east, Hunter Street to the south and Customhouse Quay to the west.
11. The subject building is seven storeys, and is positioned hard up against the street edge on both Jervois Quay and Grey Street.
12. The generous width of the roadway and the open space of Post Office Square allows clear views of the building from the north along Waterloo, Jervois and Customhouse Quays. The building can be seen from as far away as the Wellington Railway Station, although views along Waterloo Quay between Bunny Street and Whitmore Street are now partially obscured by planting.
13. Adjacent buildings to the south, and buildings on the western side of Post Office Square, are generally between eight and twenty storeys. While these buildings obscure views of the Huddart Parker Building, it remains visible from as far south as Willeston Street (looking along Jervois Quay), and as far west as Lambton Quay (looking along Grey Street).
14. Buildings on the opposite (east) side of Jervois Quay are of three or four storeys. This, combined with the quantity of open space around the buildings in this area (the waterfront), means that the building can be seen from the harbour's edge to the east.
15. The building, which was constructed for Huddart Parker, was opened in 1925, and is an example of the Chicago style, with a base, shaft, and crown. The base is two storeys, and is heavily rusticated with a plain entablature, separated from the "trunk" by a plain cornice. The shaft is plain and unadorned, with a regular hierarchy of single, paired or triple windows. A pronounced cornice divides the shaft from the building's seventh-floor crown. This crown is capped by a dentilled cornice and a shallow stepped parapet. Balconies repeat the

design and placement of those on the third floor. The building is sparsely ornamented, giving it an elegant formal quality.

16. According to the WCC Heritage Inventory:

The most important façade is that to Grey Street which contains the main entrance to the building. The central three bays of the façade are brought forward of the two corner bays and the entrance is given additional prominence with an overhanging balcony at the second floor level. The exterior of the building remains largely unaltered.

17. The Fruitgrowers' Charitable Trust moved into the building in 1941, later becoming the building owners.

18. The first primary source referring to a sign on the roof of the Huddart Parker Building is an article published in the Dominion on 5 February 1963, which is included in the WCC Heritage Inventory Assessment. This article explains:

New Zealand's first weather forecast in lights operated from the meteorological office is being built on Wellington's skyline 125 feet above Post Office Square.

The word "gale" has been selected for inclusion in the five alternative weather messages, in recognition of Wellington's peculiar needs.

The pattern of lights, five feet high on top of the Huddart Parker Building, will otherwise read "fine, "cloudy", "rain", or "change" in response to [a] mechanism something like a telephone which weather men will dial in [from] the Kelburn observatory.

The sign is being installed so that it can be clearly read from the entrance of the railway station.

It will also tell the time in hours and minutes in lighted fingers operated by a precision clock inside the building said to be foolproof against power failure.

19. The 1963 article identifies that the lit display was five feet (approximately 1.5m) high only. It does not identify the width or position of the lit display, nor does it refer to the additional advertising signage that accompanied (or possibly preceded) the lit display. However, a photograph included with the article shows that a large steel frame with static “cut out” letters advertising Caltex was already positioned on the northern side of the roof by this time. An image of the article, including the photograph, is provided in Addendum A.
20. The history of change to the sign is not well documented. A 1988 aerial photograph from Retrolens shows that the sign was advertising AGC on the east side, with what might be a lit or digital display on the west side. A 1996 photograph of the building available through WCC’s Archives online shows that the static “cut out” sign had been replaced by this time, and was advertising More FM instead of Caltex. Below the static sign was a much smaller digital display that alternated between the time and temperature. It may be assumed that this small two-tone (red and black) digital display had replaced the lit display of 1963. It appears from the photograph to be more than 1.5m high, but it is not possible to discern exact dimensions. The photographs are provided in Addendum A.
21. According to the Applicant’s Assessment of Environmental Effects, the static signage was removed from the frame during the seismic upgrade and refurbishment of the building between 2012 and 2014. The digital time and temperature display remains in place but is not in operation. A photograph of the current building is provided in Addendum A.

Heritage Status of the Building and Site

22. The building is scheduled in the WCDP as the Huddart Parker Building (17/155). It is also a strong contributor to the Post Office Square Heritage Area.
23. Neither the existing building, nor the site, is listed with Heritage New Zealand Pouhere Taonga (HNZPT).

Heritage Significance of the Building and Site

24. The WCC Heritage Inventory describes the heritage values of the building as follows:

(a) Aesthetic Value

i. Architectural

The building is a very bold and competent example of Chicago-style architecture.

ii. Group

The building is part of a group of significant heritage buildings that form the Post Office Square Heritage Area.

iii. Townscape

The building is situated on a prominent corner site at a corner of Post Office Square and Jervois Quay and has a strong street presence particularly when viewed from the north. Its rooftop has long been occupied by signage, historically by an illuminated clock and weather forecast, presently by an advertisement for a local radio station and a temperature display. This signage takes advantage of the prominence of the building, particularly for passing traffic along the key transport route of Customhouse and Jervois Quays.

(b) Historic Value

i. Association

The building retains the name of Huddart Parker, a large trans-Tasman shipping company and is historically significant for being the last of the shipping industry buildings still standing alongside the waterfront.

The building was designed by Crichton, McKay and Haughton, a prominent and longstanding Wellington architectural practice.

ii. Association

The building is associated with the nineteenth and twentieth century shipping industry.

(c) Scientific Value

i. Archaeological

The site is within the Recorded Archaeological Site for the Central City, R27/270.

(d) Social Value

i. Identity - Sense of Place - Continuity

The building façade has remained (relatively) unaltered for over 80 years and makes a strong positive contribution to the sense of place and continuity of the Post Office Square Heritage Area.

ii. Sentiment - Connection

The building once held community sentiment and connection for the temperature display and clock that was a prominent feature on the roof. This has somewhat diminished since the removal of the display.

(e) Level of Cultural Heritage Significance

i. Authentic

The building exterior has had few intrusive modern alterations and additions and retains much of the authentic building fabric.

25. With specific reference to the rooftop signage, the Heritage Inventory Report acknowledges that:

[The building's] rooftop has long been occupied by signage, historically by an illuminated clock and weather forecast, presently by an advertisement for a local radio station and a temperature display. This signage takes advantage of the prominence of the building, particularly for passing traffic along the key transport route of Customhouse and Jervois Quays.

The building once held community sentiment and connection for the temperature display and clock that was a prominent feature on the roof. This has somewhat diminished since the removal of the display.

26. The WCC Heritage Inventory describes the heritage values of the Post Office Square Heritage Area as follows:

Post Office Square heritage area is a significant and popular urban open space of over 100 years standing surrounded by a group of important former harbour board and commercial buildings. The area is named for the former General Post Office (GPO), which occupied the site of the present-day Hotel Intercontinental and IBM Tower on Customhouse Quay from 1863 to 1974.

The heritage area is not really a square in the conventional sense but it is an open, definable space at the confluence of a number of important streets, and is closely related to the establishment and use of the waterfront by the former Wellington Harbour Board (WHB). In particular, the square was, and is, the key point of access to Queens Wharf, Wellington's most historically important wharf.

The square was created partly by 19th century additions to the original 1857-63 reclamation which gave room to construct buildings on the eastern side of the square and accommodate traffic and even, for a period, a railway... With a couple of notable exceptions, the square has undergone only incremental change since the early 20th century and, as a result, it has maintained its basic configuration and essential characteristics. It is, despite the

presence of modern buildings on the edges, still recognisably the same place it was 100 years ago.

Post Office Square is a place of high heritage value and importance to Wellington and contains a number of significant heritage buildings. It is a place very familiar to many Wellingtonians and is passed daily by thousands of people, in cars or on foot.

27. The WCC Heritage Inventory also identifies that the Huddart Parker Building strongly contributes to the heritage values of the Post Office Square Heritage Area:

The square is defined by the principal buildings and the high quality of heritage streetscape they create. The oldest surviving buildings around the square are the four WHB buildings, dating from 1891 to 1905. There are three 20th Century buildings on the square that have high heritage values – Clarrie Gibbons, Huddart Parker and Tower Corporation. The other buildings are the modern Hotel Intercontinental, which although not of heritage value has its own design integrity, and the undistinguished modern Todd Corporation building (adjoining the Huddart Parker Building) which does not contribute to the values of the area.

Reports and Material Considered

28. As part of preparing this statement of evidence, I have read the following reports and correspondence for SR No. 513399:
- (a) Cover Letter, prepared by Alistair Aburn, Director of Urban Perspectives Ltd, dated 22 April 2022;
 - (b) Application Form, prepared by Urban Perspectives Ltd, dated 22 April 2022;
 - (c) Assessment of Environmental Effects prepared by Urban Perspectives Ltd, dated 22 April 2022;

- (d) Appendix 1: Owner's Statement, prepared by the New Zealand Fruitgrowers' Charitable Trust, dated 20 April 2022;
- (e) Appendix 2: Engineer's Statement on Huddart Parker Sign Steelwork, prepared by Dunning Thornton Consultants, dated 23 September 2020;
- (f) Appendix 3: Signage Elevation Drawings, unnamed and undated;
- (g) Appendix 4: Photomontages, unnamed and undated;
- (h) Appendix 5: Heritage Assessment, prepared by Archifact Ltd, dated 31 March 2022;
- (i) Appendix 6: Peer Review of the Heritage Assessment, prepared by Richard Knott Ltd, dated 6 April 2022;
- (j) Appendix 7: Traffic Engineering Report, prepared by Stantec, dated 8 April 2022.

29. In preparing this evidence, I have also used the following documents:

- (a) Wellington City District Plan (WCDP);
- (b) Heritage New Zealand Pouhere Taonga's (HNZPT's) Sustainable Management of Historic Heritage Guidance Series Information Sheet 21: Assessing Impacts of Advertising Signs on Historic Heritage.

Site Visit

30. I visited the site in May 2022. I was not given access inside or onto the roof of the building, so was only able to undertake an inspection from the outside at ground level.

Legislative Requirements

31. The rules of Chapter 21D of the Operative WCDP apply to the Application. Rule 21D.1.1 states that one sign of less than 0.5m² on a listed building or object that denotes the name, character or purpose of any activity undertaken on the

site, is a Permitted Activity. Rule 21D.1.2 states that signs on listed heritage buildings or objects which are not a Permitted Activity are Discretionary Activities (Restricted) in respect of: sign design, location, and placement (21D.3.1.1); area, height and number of signs (21D.3.1.2); illumination (21D.3.1.3); and fixing and methods of fixing (21D.3.1.4).

32. The Central Area rules of Chapter 13 also apply. According to Rule 13.3.9, signs that do not meet one or more of the standards specified in section 13.6.4.1 are Discretionary Activities (Restricted) in respect of: moving images, text or lights (13.3.9.1); position (13.3.9.2); dimensions (13.3.9.3); number of signs (13.3.9.4); sign display (13.3.9.5); and duration (for temporary signs) (13.3.9.6).

Description of the Proposal

33. The proposal is to install rooftop signage in the form of a digital billboard on the Huddart Parker Building at 2 Jervois Quay. The building is individually scheduled and is also within the Post Office Square Heritage Area.

34. It is proposed that the sign will be secured to the existing landscape-orientated sign support framework on the roof of the building which is oriented toward southbound traffic on Customhouse Quay and Jervois Quay. According to the Application, site measurements of the existing steel frame indicate that the maximum sign size will be 13m long and 4m high, with the base of the sign effectively at the top of the existing parapet level.

35. The digital display will change on a rotating basis and feature a combination of public information and commercial advertising. It is anticipated that there will be up to six different displays, with a minimum image display time of 8 seconds and a 0.5 second dissolve transition between images.

36. According to the Application, the sign illumination levels will be automatically managed so that the screen is responsive to changes in ambient lighting levels.

Applicant's Assessment of Environmental Effects as it Relates to Heritage

37. The applicant has relied on the Assessment of Effects on Historic Heritage prepared by Archifact Ltd, and a peer review of this document by Richard

Knott; as well as the Assessment of Environmental Effects (AEE) prepared by Urban Perspectives Ltd. I note that none of these documents provide a detailed historical account of the sign, its erection or the changes that have occurred over time, and the associated impacts that these changes have had on the heritage values of the Huddart Parker Building or the Post Office Square Heritage Area.

38. Conclusions provided in the Assessment of Effects on Historic Heritage are summarised as follows:

The proposal represents a reinstatement of an historic condition recognised in itself as having heritage values in the WCC heritage inventory record. A sign fixed to the surviving metalwork signage frame atop the Huddart Parker Building was first established in the early 1960s; nearly two thirds of the buildings 97 years' history thus far. The (1963) combined clock and temperature display on top of the building was once a familiar inner-city landmark ...

The relatively compressed nature of the Post Office Square Heritage Area in addition to the high rooftop location of the proposed reinstated sign significantly mitigates perceived immediate effects arising from the sign on both the Huddart Parker Building and the [Post Office Square] Heritage Area. Views of the proposed sign are most apparent (and limited) to south-moving traffic on Customhouse Quay at some distance from the Huddart Parker Building; a view that becomes less complete and more removed from the normal line of sight as one nears the building.

The proposed reinstatement of a billboard (in this case a digital billboard) onto the existing steel signage frame on the roof of the Huddart Parker Building and within the Post Office Square Heritage Area will not present adverse effects on the heritage significance values or context of the Huddart Parker Building or the wider Post Office Square Heritage Area, nor will it affect the ability to interpret heritage features of the Huddart Parker Building, the wider Post Office Square Heritage Area, or other nearby heritage places. In the

wider setting, the proposal does not represent cumulative adverse visual “clutter” as its elevation and the necessary horizontal distance to view the sign reduces its relative area within the receiving environment.

Overall, the proposed digital billboard is considered appropriate and supportable.

39. The peer review undertaken by Mr Knott concludes that:

... I accept and support Archifact’s assessment against the relevant policies and assessment criteria of the Wellington City District Plan and consider that the proposal digital sign, which will be fixed to the existing sign structure, will not be a dominant feature in views from locations in Customhouse Quay or Grey Street and will appear as an integral part of the wider urban context. As such, I consider that it will not have a more than minor effect on the heritage significance of the Huddart Parker Building or the Post Office Square Historic Heritage Area.

40. I do not agree that the proposed installation of a digital billboard in place of the previous sign can be referred to as a “reinstatement of an historic condition”. Although there has previously been signage on the rooftop, and the billboard is proposed to be fixed to the pre-existing steel signage frame, it is, by its nature, a different type of sign that will have different effects. Furthermore, the Application does not provide clear evidence that the existing steel frame will be able to be reused for the proposed purpose.

41. While I agree that Post Office Square is a relatively compressed area, and the rooftop location of the proposed billboard means that it would not be a dominant feature from some close key viewpoints, I do not agree that the overall effects on the heritage values of the Huddart Parker Building or the Post Office Square Heritage Area will be “no more than minor”.

42. The AEE refers to consultation with Heritage New Zealand Pouhere Taonga, stating:

Although the building is not included on the New Zealand Heritage List/Rarangi Korero, initial consultation with Heritage New Zealand confirmed general support for the proposal.

43. The footnote associated with this statement identifies that the initial consultation was undertaken by Ian Bowman, who had provided an assessment of effects on heritage for the proposal that was presented during the 2019 pre-application process. A transcript or other written record of the consultation has not been provided with the Application. Mr Bowman has since been replaced as the Applicant's heritage advisor by Archifact, and there have been some (albeit minor) changes to the proposal since 2019. Therefore, any views previously expressed by Heritage New Zealand are of little relevance to the current Application.

Assessment of Effects on Heritage Values

44. The assessment criteria for Rule 21D.3 have assisted me to determine whether the effects of the proposed sign on the heritage values of the Huddart Parker Building are acceptable. I have also used Heritage New Zealand Pouhere Taonga's Sustainable Management of Historic Heritage Guidance Information Sheet 21: Assessing Impacts of Advertising Signs on Historic Heritage.

21D.3.1.5 *The extent to which any sign including supporting structures detracts from the heritage significance or values of a heritage building or object.*

45. Council has recognised that the rooftop signage on the Huddart Parker Building that was erected in the early 1960s and stood until the mid-2010s contributed to its social and townscape value, as evidenced by the Heritage Inventory Report.
46. Social value was derived primarily from the time and temperature display, which would have provided a useful reference at a time when this information was not readily accessible to pedestrians or passing motorists via other electronic media. There is no evidence that social value was derived from the advertising.

47. Further, the previous signs were fundamentally different to the proposed digital billboard. The lit time and weather display, and later the digital temperature and clock, only occupied a small portion of the overall area of the steel frame. The advertising generally consisted of cut out static letters mounted on the steel frame, with a much smaller surface area,¹ allowing the sky to be seen between the letters. The proposed digital billboard has a surface area at least the same size as the face of the steel frame (approximately 13m long by 4m high, or 52m²), and will be a rectangular block with no transparency. It will be fully illuminated, and will feature images that can change every 8 seconds, which is more than 420 images per hour, or more than 10,000 images per day.
48. Therefore, the proposed digital billboard cannot be considered to be a “reinstatement of an historic condition” or fabric that has heritage value. Rather, the proposed digital billboard will detract from the aesthetic values of the building, becoming its most dominant feature.
49. While I acknowledge that views of the proposed digital billboard are most apparent to south-moving traffic on Customhouse Quay, I do not agree with the Applicant’s Assessment of Effects on Historic Heritage that the “relatively compressed nature of the Post Office Square Heritage Area in addition to the high rooftop location of the proposed sign significantly mitigates perceived immediate negative effects arising from the sign on both the Huddart Parker Building and the Heritage Area”. As the visualisations provided in Appendix 4 of the Application clearly demonstrate, the digital billboard will be clearly visible from within the Post Office Square Heritage Area, and from Grey Street, distracting from its most prominent façade (the north façade) from as far away as the Wellington Railway Station, as stated in paragraph 12 above. This will be further exacerbated by the rapidly changing images.

¹ Smaller than the total area of the face of the frame.

50. The relevance of “Covenant 2 of the Second Schedule of the Deed relating to the purchase of land by Huddart Parker Limited from the WCC made on the 8th of March 2002” to this assessment criterion is unclear, and therefore I have not addressed it.

21D.3.1.6 ***Whether any sign detracts from the architecture of the building including decorative detailing, structural divisions, windows or doorways.***

51. The digital billboard will not directly impact on the fabric of the building facades, which has three distinct parts – a base, a shaft and a crown - separated and capped by cornices. I do not agree with the Applicant’s Assessment of Effects on Historic Heritage that the electronic billboard would be “legibly unrelated” or that it “does not detract from the architecture of the building”. The digital billboard will draw attention to the top of the building, away from its overall composition, and will distract from the crown of the building, particularly the capped dentilled cornice, which is intended to be a prominent feature of the building’s composition. Although not “part” of the Grey Street façade, the size and position of the billboard would alter the perceived proportions of the Grey Street façade which is recognised, in particular, as being of significance in the Heritage Inventory Record.

52. The Applicant’s Assessment of Effects on Historic Heritage refers to the “advantages” of the proposed billboard including “ease of change; active and live data outputs (time and temperature as per the historic signage); and, illumination levels that will be automatically managed so that the screen is responsive to changes in ambient lighting conditions”. However, it is unclear how these “advantages” reduce the extent to which the billboard will detract from the architecture of the building, and based on similar screens with adaptive lighting systems across the city, the billboard will still be significantly brighter than a non-illuminated board.

21D.3.1.7 *Whether additional signs will result in clutter.*

53. The Applicant's position is that the proposed digital billboard represents "reinstatement of an historic condition" and, as there are currently no other signs on the building, cannot be considered an "additional sign".

54. Further, the Assessment of Effects on Historic Heritage states that:

In the wider setting, the proposal does not represent cumulative adverse visual "clutter" as its elevation and the necessary horizontal distance to view the sign reduces its relative area within the receiving environment.

55. I do not agree that the proposed digital billboard would be "reinstatement of an historic condition" for reasons discussed under 21D.3.1.5 (paragraphs 45 to 50). However, I acknowledge that there are no other prominent signs on the building, and the rooftop location of the proposed billboard means that it does not create visual "clutter" at street level within the immediate vicinity of the building.

21D.3.1.8 *The extent to which the quality of the design of the sign and the standard of graphics complement the building or object.*

56. The Application does not include details for the design of the digital billboard. The Assessment of Effects on Historic Heritage describes the typical composition of a digital sign as "an array of standard sized panels arrayed or tiled together to an overall dimension." The size of the proposed billboard, being 13m long and 4m high, "relates closely to the existing signage frame fixed to the roof of the Huddart Parker Building", although no dimensions for the existing frame are provided.

57. The Assessment of Effects on Historic Heritage continues: "typically the sides and rear faces of the digital billboard are finished in a dark colour to reduce the visual impact of any incidental details on those surfaces." However, digital billboards are generally fixed on buildings' elevations, and their rear face is not

visible. This information is not sufficient enough to make an informed assessment about the quality of the design of the proposed billboard.

58. Further, the existing steel frame has been left unused for up to ten years, and the Application does not demonstrate that it is capable of supporting the proposed digital billboard. Rather, the application acknowledges that further investigation by an engineer is required to determine whether the frame is suitable. The Engineer's Statement from Dunning Thornton Consultants Ltd suggests that, at the very least, some members of the frame will need to be augmented or replaced, and that replacement of 50% of the existing fixings should also be allowed for. Neither modification nor replacement of the existing steel frame are part of the application.
59. Overall, there is no outstanding quality in the design of the 52m² "standard sized panels arrayed or tiled together" that would complement the heritage building.
60. The proposed billboard will feature images that change every 8 seconds. It may be assumed that the revolving images will also change over time. In this respect, it is not possible to assess the standard of graphics.

21D.3.1.9 *Whether the means of fixing the sign to a listed building or object including associated cabling or wiring for illuminated signs will adversely affect the heritage fabric and heritage values of the listed building or object.*

61. I accept the position taken in the Applicant's Assessment of Effects on Historic Heritage that fixing, cabling or wiring are unlikely to have any notable adverse effects on the heritage fabric of the Huddart Parker Building insofar as it is intended that the billboard will be fixed to the existing steel signage frame.
62. However, as already noted, the Applicant has not confirmed that the existing steel frame is capable of supporting the proposed digital billboard. If consent for digital rooftop billboard were to be granted, and the existing frame was subsequently found to be inadequate, then a replacement frame, and the associated fixing, may adversely affect heritage fabric.

21D.3.1.10 ***Whether intensity of illumination will adversely affect the heritage values of the building or object.***

63. According to the Application, the illumination levels of the proposed digital billboard will automatically adjust to changes in ambient lighting conditions, i.e. illumination will increase in brighter conditions and decrease in duller conditions.

64. However, this does not directly address the question of whether illumination, in and of itself, will adversely affect the heritage values of the building. By their nature, illuminated signs are intended to draw attention. Even when the illumination levels are decreased during “dull” conditions, or at night time, the sign will still be the dominant visual feature.

65. This will be further intensified by the proposed rapid changing of images at 8 second intervals.

21D.3.1.11 ***The extent to which signs comply with the Design Guide for Signs.***

66. The relevant Signs Design Guide (SDG) provisions are discussed below. The SDG notes that:

Heritage items (buildings, objects, trees and areas) have special significance to the city. Signs relating to them should be designed and located carefully to avoid detracting from the special qualities of the heritage item, especially listed buildings or areas. Depending on the heritage significance of the item and its setting, this may mean only limited signage is allowed, if any.

The scale and location of signs on heritage buildings should be sensitively approached. Signs projecting above the parapet line ... have a significant impact on the heritage value of the building, altering its silhouette line and compromising its overall quality.

SDG O1.1 ***To ensure that new signs are well integrated with the building or site to which they are attached, and are***

compatible with the scale, design and visual character of that building or site.

67. While it is acknowledged that there has been rooftop signage on the Huddart Parker Building since the 1960s, and that this signage is referred to specifically in the Heritage Inventory Record for the building, the proposed billboard cannot be considered as a “reinstatement” of the previous signage, and therefore it must be assessed as a new sign.

68. The proposed billboard will project several metres above the building parapet and, because it lacks the partial transparency of previous “cut out” signs in this position, it will have a greater impact on the silhouette line and overall quality of the building than previous signage has had - particularly the Grey Street elevation which is the most significant of the four elevations and faces into the Post Office Square Heritage Area.

SDG O2.1 To ensure that new signs fit with the character of the surrounding area and acknowledge the wider city context.

69. I accept the statement made in the Applicant’s Assessment of Effects on Historic Heritage that the area immediately surrounding the Huddart Parker Building and Post Office Square features a number of tall, modern buildings. The framing of the Square with tall buildings to the south and west is identified as a feature of the Area in the Heritage Inventory Report. The proposed billboard will not change this aspect of the area’s character. However, the addition of an illuminated sign with changing display on the Huddart Parker Building will draw attention away from the Square and other surrounding buildings. There are no other similar billboards in the vicinity of the Square.

SDG O3 To protect the significant characteristics of buildings, streetscapes, vistas and the city skyline from obtrusive signage.

70. I do not agree with the Applicant’s Assessment of Effects on Historic Heritage that the proposed billboard “will maintain, and make no significant change to, the historic built condition, streetscape characteristics, and skyline within the

area". This position hinges on the premise that the proposed billboard is a reinstatement of previous signage, and I do not agree (refer to discussion under 21D.1.3.5, paragraphs 45 to 50). Further, I do not agree that the proposed billboard is "located within the elevation of an existing building" as both the previous signage (and the remaining frame) and the proposed billboard will be mounted on the rooftop.

71. By the nature of its design, the proposed billboard will necessarily be more dominant than the previous signage, which allowed views of the sky between the "cut out" letters. The proposed billboard will have a significant visual impact on the streetscape and vistas in the surrounding area, particularly along Customhouse and Jervois Quays, as evidenced by the visualisations provided in the Application and in the Assessment of Effects on Historic Heritage, and will draw attention away from the immediate streetscape.

SDG 08 ***To ensure that new signs do not detract from the heritage context and significance of listed heritage items.***

72. The new digital billboard will detract from the heritage context and significance of listed heritage items.
73. For discussion of the heritage context, refer to SDG 03 above.
74. For discussion regarding effects on significance of the Huddart Parker Building itself, refer to 21D.1.3.5 (paragraphs 45 to 50) above.

SDG 08.1 ***Signs on or adjacent to identified heritage buildings, or within heritage areas, should be:***

- ***consistent in scale, form, materials, colours and design with the architectural form of the building to which they are attached, and sympathetic to its context.***

75. The proposed 52m² billboard is of a substantial scale and, while it will take the position of previous signage, is very different in form, materials, colours and design to the architectural form of the Huddart Parker Building.

SDG 08.1 ***Signs on or adjacent to identified heritage buildings, or within heritage areas, should be:***

- ***appropriately located on the building or site, and of a compatible type and style.***

76. While it is acknowledged that there has previously been rooftop signage on the Huddart Parker Building (the frame for which remains) and that the signage is referred to as contributing to certain values held by the building, it does not follow that the same location is appropriate for an electronic billboard.

SDG 08.1 ***Signs on or adjacent to identified heritage buildings, or within heritage areas, should be:***

- ***of a high standard in terms of materials, graphics, construction and detail.***

77. The proposed billboard has been described as “an array of standard sized panels arrayed or tiled together”. This is not of a high standard in terms of materials, graphics, construction and detail, as provided for in SDG 08.1.

78. Refer to discussion under 21D.3.1.8 (paragraphs 56 to 60).

SDG 08.1 ***Signs on or adjacent to identified heritage buildings, or within heritage areas, should be:***

- ***an aid to identifying and understanding the heritage item, if located on the front/main building elevation.***

79. The proposed billboard will be located above the parapet on the front elevation of the Huddart Parker Building, and does not aid in identifying or understanding the building.

SDG 08.1 ***Signs on or adjacent to identified heritage buildings, or within heritage areas, should be:***

- *attached to the building with minimal intrusion into the building fabric, and in a way that allows easy removal without damage to any significant fabric.*

80. The proposal is to attach the billboard to the existing signage frame. However, further investigation by engineers is required to confirm that it is suitable for the billboard, and this is acknowledged in the Application.

SDG 08.1 Signs on or adjacent to identified heritage buildings, or within heritage areas, should be:

- *designed and installed in sympathy with existing signs.*

81. The proposed billboard will feature continuously changing advertising. There are no other similar billboards or electronic signs in the immediate area.

SDG 09 To ensure that illuminated and animated signs are appropriate for their context and do not compromise the amenity of nearby Residential Areas, prominent public spaces, or areas of special character or heritage value.

82. The Post Office Square Heritage Area has defined heritage values, and is also a prominent public space. While the rooftop position of the proposed billboard may not impact on the utility of the Square, it will likely impact on the attractiveness of the space, particularly during darker hours.

Objective 12.2.10 To achieve signage that is well integrated with and sensitive to the receiving environment, and that maintains public safety.

83. Although it is proposed to be installed in the same position as previous signage, the billboard – which will be digital, illuminated, and have revolving images - would introduce a very noticeably different element onto the Huddart Parker Building and into the existing Post Office Square Heritage Area environment.

84. To the best of my knowledge, the proposed billboard does not impact on public safety; however, this matter is outside of my area of expertise.

Policy 12.2.10.2 ***Manage the scale, intensity and placement of signs to: maintain and enhance the visual amenity of the host building or site, and ensure public safety.***

85. The scale and intensity of the proposed billboard will not be the same as for the previous rooftop sign. The billboard will present as a solid block, without the transparency of the previous “cut out” letter signs. It will therefore appear larger and more dominant than the previous signage. The digital nature of the billboard, and the associated illumination and continuously changing images (more than 420 images per hour), will present a much more intense display than the previous signage did.

86. Overall, the scale, intensity and placement of the billboard is not considered to enhance the visual amenity of the host building or the site (as discussed above).

Policy 12.2.10.3 ***Ensure signs in the Central Area do not adversely affect the architectural integrity of the building on which the sign is located.***

87. Refer to discussion under 21D.3.1.5 (paragraphs 45 to 50) above.

Policy 12.2.10.5 ***Control the number and size of signs within heritage areas and areas of special character.***

88. Refer to discussion under 21D.3.1.8 (paragraphs 56 to 59) above.

Policy 20.2.1.9 ***Ensure that signs on listed heritage buildings or objects (or sites on which they are located) or within Heritage Areas do not adversely affect heritage values and qualities and avoid unnecessary or inappropriate signage.***

89. Refer to discussion under 21D.3.1.5 (paragraphs 45 to 50) above.

90. The Application presents the proposed electronic billboard as a means of gathering funds for building maintenance, and is receptive to a consent condition as a means of ensuring this. However, this does not make the billboard necessary.

Heritage New Zealand Pouhere Taonga (HNZPT) Sustainable Management of Historic Heritage Information Sheet 21: Assessing Impacts of Advertising Signs on Historic Heritage.

91. When assessed against the Heritage New Zealand guidelines my findings are that:

- (a) The proposed billboard does not acknowledge and respect the character of the façade of the Huddart Parker Building.
- (b) The proposed billboard does not follow historically documented precedents for the locality both in style and in proportion.
- (c) Although the proposed billboard does not cover or obscure any significant views, areas, and heritage features, or necessitate the removal of decorative features or detailing, it cannot be considered discrete.
- (d) The proposed billboard is illuminated, not a static sign lit by external lighting.

Matters Raised in Submissions and Response to Submission Points

92. I have reviewed the thirteen submissions (including one late submission) received in relation to Application SR No. 513399. Three submissions oppose the Application, while ten support the Application.

93. For submissions in opposition to the proposal, I have broken down my comments by submitter, and noted where I agree.

In Opposition to the Proposal		
	Submitter	Reviewer's Comment
(a)	Scott Hamilton, InterContinental Hotel Wellington	The submitter makes six points in their submission, five of which relate to direct LED light impacting on hotel rooms, and associated loss of quiet enjoyment for guests and therefore loss of revenue for the hotel. These are not heritage matters. Their sixth point states that the proposal does not fit with the current plans for the precinct. It is not clear from the submission what plans the submitter is referring to; however, I agree with this point insofar as it may relate to the operative District Plan rules and Design Guide for Signs.
(b)	Hamish Wesney, Boffa Miskell Ltd	I agree with the points made in this submission in general. The proposed billboard is unlikely to be read as an element that is separate from the building. The proposed billboard cannot be compared to the previous signage in terms of style, technology and illumination, particularly as the earlier signage was permeable. The photomontages in the application do not give an accurate

In Opposition to the Proposal

	Submitter	Reviewer's Comment
		<p>representation of what the proposed electronic billboard will look like, its integration with the façade, or its effects on the building and area. The building itself is a landmark feature of Post Office Square due to its height and design; and the increase in perceived height that would be caused by the proposed billboard would have an adverse effect on the scale of the building in relation to Post Office Square as well as on its visual amenity perceived from Jervois Quay. These effects are contrary to the objectives and policies for the Design Guide for Signs in the operative District Plan.</p> <p>The submitter notes that signage in this location may be acceptable to them if it was better aligned with the character of the building and did not dominate the streetscape. I agree that, in theory, it may be possible to design signage that was appropriate for the place.</p>
(c)	Morgan Slyfield, Stout Street Chambers	I agree with the submitter that the proposed electronic billboard fails

In Opposition to the Proposal		
	Submitter	Reviewer's Comment
		assessment against the criteria of Rule 21D.3.1, is contrary to relevant Central Area and Heritage policies and objectives, and does not satisfy relevant objectives and guidelines in the Design Guide for Signs.

94. For submissions in support of the proposal, I have extracted the key points made by the submitters that are relevant to historic heritage values, and provided a response.

In Support of the Proposal		
	Submission Point	Reviewer's Comment
(a)	The time and temperature display on the previous sign are missed by the submitter personally or (according to the submitter) by Wellingtonians generally; and reinstatement of a sign with this information would therefore be positive.	Many of the submissions in support of the proposal claim that Wellingtonians miss the time and temperature display of the previous sign. While the submissions indicate that the submitters themselves have missed the sign, none have provided evidence that there is a wider feeling amongst Wellingtonians. The sign was removed up to ten years ago, and there will likely be many who regularly move through this part of the CBD who are

In Support of the Proposal		
	Submission Point	Reviewer's Comment
		<p>unaware that there ever was a sign on the building.</p> <p>None of the submissions that give this reason for supporting the proposal address the fact that the primary purpose of the proposed billboard will be advertising, not a time or temperature display. In the current Application, there is no guarantee that the billboard would display the time and temperature at all, let alone the size of that display and/or whether it would be on rotation. Further, it may be assumed that the submitters making this point would be just as satisfied with a much smaller sign showing the time and temperature only.</p> <p>The submissions making this point also overlook the reality that the digital billboard that is being proposed is not a reinstatement. It is an entirely new sign that, while it may utilise the same structural frame as the previous sign (a matter that is itself under</p>

In Support of the Proposal		
	Submission Point	Reviewer's Comment
		question), will have a completely different appearance.
(b)	There are few, if any, other time and temperature displays in the CBD and/or on the Waterfront, so reinstatement of a sign with this information on the Huddart Parker Building would be positive.	In and of itself, this is not a reason to put an electronic billboard with a time and temperature display on top of the Huddart Parker Building. Refer to the above point (paragraph 94(a)) with regards to "reinstatement".
(c)	The previous sign on the building was a recognisable part of the Wellington landscape; a recognisable part of the Wellington skyline; and/or was a landmark for many years.	I acknowledge that the previous sign had some social and townscape value (refer paragraphs 45 and 47). However, the proposed electronic billboard will be considerably different to the previous sign. Further, it does not mean that any new sign will achieve the same landmark qualities.
(d)	The previous sign did not detract from the	Even if I agreed with this statement, it does not mean that the proposed electronic billboard does not detract from the overall

In Support of the Proposal		
	Submission Point	Reviewer's Comment
	overall aesthetics of the area.	aesthetics of the area. Again, submissions citing this reason have not considered that the electronic billboard will be considerably different to the previous sign.
(e)	Looking at a sign to find out the time and weather conditions is easier and safer than looking at a phone for drivers, pedestrians and cyclists.	This is not a heritage matter. However, I would note that a pedestrian can safely look at a phone; and that most vehicles have a clock on their dashboards, while many also now have temperature displays.
(f)	The Application is seeking to reinstate a previously consented feature.	Refer to the comments above with regards to "reinstatement" (paragraph 94(a)). It is my understanding that there are no standing use rights and/or previous consents for a sign on top of the Huddart Parker Building that are valid.
(g)	The owners deserve to earn some money by reinstating a sign on the building.	This is not, in and of itself, a heritage matter. For discussion related to covering maintenance costs, refer paragraph 90 above.

Conclusion

95. The Huddart Parker Building at 2 Jervois Quay has aesthetic value as a bold and competent example of Chicago-style architecture located on a prominent corner site that remains largely unaltered. It is a key contributor to the Post Office Square Heritage Area, a significant and popular urban open space of over 100 years, surrounded by important former harbour board and commercial buildings. The building has historic value for its association with prominent and longstanding Wellington architectural practice Crichton, McKay and Haughton; and to the trans-Tasman shipping company Huddart Parker.
96. The building has had rooftop signage since 1963. This has historically consisted of a combination of 'cut out' lettering and an electronic illuminated clock and weather display. The 'cut out' signage was removed sometime between 2012 and 2014, but the steel frame was left in place. The digital clock and temperature display that has been in place since at least the 1990s remains in front of the steel frame but is no longer operational.
97. The proposed digital billboard, in place of the previous static sign with 'cut out' letters mounted to the existing steel frame on the rooftop of the building, is not a "reinstatement of an historic condition". Although there has previously been signage on the rooftop, and the billboard will be fixed to the pre-existing steel signage frame, it is, by its nature, a different type of sign that will have different effects.
98. The proposed billboard does not aid in identifying or understanding the Huddart Parker Building or the Post Office Square Heritage Area. It will project several metres above the building parapet and, because it lacks the partial transparency of previous "cut out" signs in this position, it will have a greater impact on the silhouette line and overall quality of the building than previous signage has had - particularly the Grey Street elevation which is the most significant of the four elevations and faces into the Post Office Square Heritage Area.
99. The proposed billboard will appear larger and more dominant than the previous signage; and the digital nature of the billboard, including the

illumination and the rapidly and continuously changing images, will present a much more intense and dominating display than the previous signage did.

100. While I agree that Post Office Square is a relatively compressed area, and the rooftop location of the proposed billboard means that it would not be a dominant feature from some close key viewpoints, I believe the negative effects that the billboard will have on the heritage values of the Huddart Parker Building and the Post Office Square Heritage Area will be notable.

101. My assessment above has confirmed the conclusion in my Heritage Advisor Assessment (dated 22 June 2022) that the works proposed in the Resource Consent Application do not conform to the assessment criteria given in the Wellington City District Plan or with heritage best practice; and that there is no sufficient justification or mitigation for the negative effects that the proposed billboard will have on the building.

102. Based on the above assessment, the proposal **is not supported** on heritage grounds.

Suggested Changes to Proposal

103. That the digital billboard be changed to a static, non-digital, non-illuminated sign:

- (a) with cut-out letters with a similar surface area to the previous signs, mounted on the existing framework; and
- (b) that is limited to the building name, or the name/logo of the business, or the owner or occupier of the building (or site) on which the sign is located.

104. Please note that, should a Resource Consent be granted for the proposed digital billboard, there are several conditions that should be included, and these will need to be discussed further with the other Council Officers. These conditions will need to address matters such as:

- (a) The design of the billboard, including (but not limited to) all dimensions and all fixings.

- (b) The permanence, position and size of the time and temperature display.
- (c) The frequency with which displayed advertising images rotate.
- (d) Illumination levels.
- (e) What, if any, building maintenance funding can be made contingent on the Applicant receiving income from the digital billboard advertising.



Chessa Stevens

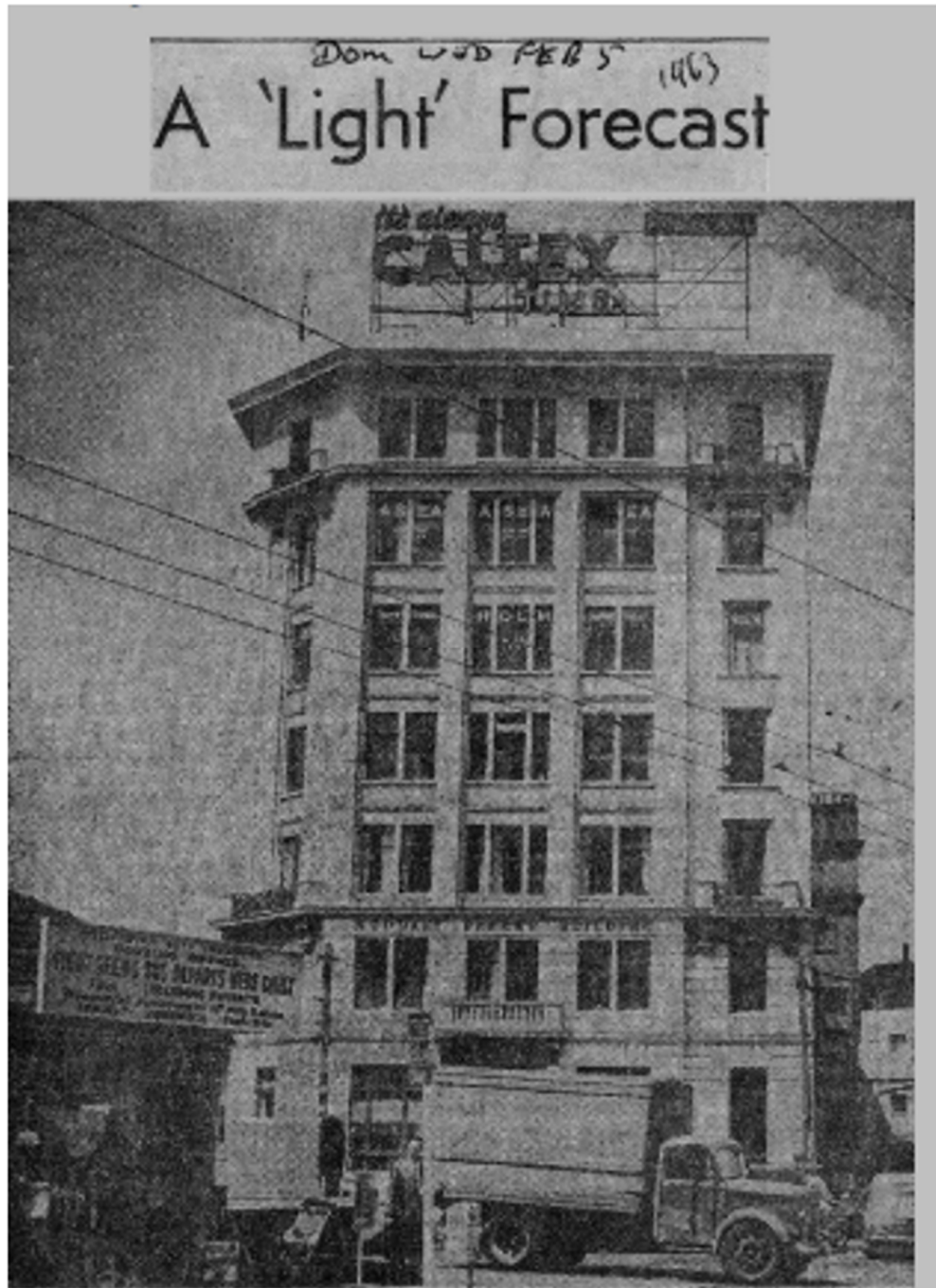
WSP Principal Conservation Architect and National Built Heritage Lead

15 November 2022

**ADDENDUM A TO SECTION 42A REPORT OF CHESSA STEVENS – HERITAGE
ASSESSMENT**

Dated 15 November 2022

1. This Addendum provides images referred to in the body of the s42A Report.
2. The images below (being the photograph and the article) are taken from the Dominion, Wednesday February 5th, 1963:



Weather On The Skyline

New Zealand's first weather forecast in lights operated from the meteorological office is being built on Wellington's skyline 125 feet above Post Office Square.

The word "gale" has been selected for inclusion in the five alternative weather messages, in recognition of Wellington's peculiar needs.

The pattern of lights, five feet high, on top of the Huddart, Parker Building, will otherwise read "fine," "cloudy," "rain" or "change," in response to mechanism something like a telephone which weather men will dial in the Kelburn observatory.

The sign is being installed so that it can be clearly read from the entrance of the railway station.

It will also tell the time in hours and minutes in lighted figures operated by a precision clock inside the building said to be foolproof against power failure. The figures will not light up during an electricity

breakdown, but "stored-up" time will enable the correct time to be flashed on when power resumes.

Some of the mechanical equipment has not yet arrived in New Zealand, so it may be six weeks or two months before the sign is fully operative.

Auckland has a sign which records time, Dunedin one recording time and temperature. In Christchurch there is a weather sign, but it is not worked direct from an official source.

3. The image below is taken from Retrolens Survey No. SNC8937, Run No. B, Photo No. 21, taken 26 February 1988. The sign is circled:



4. The image below was taken as part of the Mobil Street Race in 1996 and was sourced from Wellington City Council's Archives Online (<https://archivesonline.wcc.govt.nz/nodes/view/122269>):



5. The images below were taken by the author of the s42A Report on 10 November 2022. They show that the digital time and temperature display, which is identified with the red arrow, remains in place (compare with the image in paragraph 4):



15 November 2022

Statement of experience – Noel Luzzi

I hold the qualifications of Architecte DPLG (architect certified by the French Government) from the Ecole Nationale Supérieure d'Architecture de Grenoble (University of Architecture, France-2000), with specific acknowledge in heritage and vernacular architecture.

I have undertaken ongoing continuing professional development including training in France, Switzerland and Belgium, on contemporary architectural heritage (MAS – Developmental du patrimoine architecture moderne et contemporain, University of Architecture, Geneva, Switzerland), and sustainable architecture (MAS – Architecture et development durable, Ecole Polytechnique Fédérale de Lausanne – Switzerland; Ecole Nationale Supérieure d'Architecture de Toulouse – France; Faculté d'architecture, d'ingénierie architecturale, d'urbanisme de Louvain-la-Neuve – Belgium).

I have interest for, and have been involved in the field of architecture, heritage, and conservation since 1992, with experience in France, Italy, Switzerland, Belgium, Afghanistan, and more recently New Zealand:

- I have experience in both the public and private sector in France. I have worked for 17 years with Francois Chatillon, Architecte en Chef des Monuments Historiques. In particular, I have managed projects for restoration, transformation and modernisation of ancient, modern, and contemporary protected buildings, as well as projects for public and private new buildings. I have also collaborated on programs for the definition of urban policies for the restructuration and redevelopment of historical districts or city centres.
- I have experience in both the public and private sector in Switzerland. In particular, I have worked at the main Swiss train company (SBB) in the capacity of Senior Program Manager for the transformation and upgrade of 125 regional and heritage railway stations, in the context of the implementation of the equality Act for people with disabilities, within a national program concerning 350 stations. I have also been in charge of the implementation of strategic infrastructure developments.
- I have experience in the public sector in New Zealand since my relocation in July 2019. I have been working in the capacity of Senior Built Heritage Specialist since then, at Auckland Council (July 2019 – April 2022), and since May 2022 at Wellington City Council, which allows me to be involved in the preservation of New Zealand's outstanding architectural heritage.

I also have interest in teaching. I was an assistant of Pr. Nicola Ragno at the Ecole Nationale Supérieure d'Architecture de Grenoble, and I am involved as a mentor in the University of Auckland virtual internship programme.

I am a member of ICOMOS New Zealand/Te Mana o Nga Pouwhenua o Te Ao.

Application for land use consent for 2 Jervois Quay, Wellington, SR 513399

I have reviewed the Section 42A Report - Heritage Assessment prepared by Chessa Stevens (dated 15 November 2022).

I generally agree with her assessment and conclusion that the proposed new digital billboard will have significant adverse affect on the heritage values of the Huddart Parker Building and the Post Office Square Heritage Area, and that the proposal cannot be supported from a heritage perspective.

A handwritten signature in black ink, appearing to read 'Noël Luzzi', with a horizontal line extending to the right.

Noël Luzzi

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